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CITY OF HENDERSON, KARL LIPPISCH,
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UNITED STATE DISTRICT COURT
DISTRICT OF NEVADA

DANIEL ANDREWS,

Plaintiff,

v.

CITY OF HENDERSON, a Nevada
Municipal Corporation; KARL LIPPISCH,
and PHILLIP WATFORD,

Defendants.

CASE NO.: 2:18-cv-01625-RFB-BNW

**STIPULATION AND ORDER TO EXTEND
PRETRIAL ORDER DATE
(FOURTH REQUEST)**

Plaintiff, DANIEL ANDREWS (“Andrews”) and Defendants CITY OF HENDERSON, KARL LIPPISCH, and PHILLIP WATFORD (“Defendants”), by and through their counsel, hereby stipulate and agree to extend the remaining Pretrial Conference and Pretrial Order date as follows:

1. On January 16, 2019, the United States District Court filed its Scheduling Order [#21].
2. On January 23, 2019, the parties jointly filed their Proposed Discovery Plan and Scheduling Order [#24].
3. On February 12, 2019, the parties filed a first request for an extension as it relates to expert disclosures, Interim Status Report, and the Discovery Cut-Off dates [#27].

1 4. On February 13, 2019, the United States District Court filed its Order [#28], granting
2 the stipulated extension of the expert disclosure, Interim Status Report, and the Discovery Cut-Off
3 dates.

4 5. On May 13, 2019, the parties filed a second request for an extension of the rebuttal
5 expert disclosure deadline and stipulated to stay discovery [#40], as Plaintiff's counsel was scheduled
6 to have open-heart surgery and needed at least two months to recuperate.

7 6. On May 14, 2019, the United States District Court filed its Order [#41], granting the
8 stipulated extension and the stipulation to stay discovery.

9 7. On August 29, 2019, Plaintiff filed his First Amended Complaint [#49] and added a
10 new defendant, Phillip Watford.

11 8. On September 11, 2019, Defendants City of Henderson and Karl Lippisch filed their
12 answer to the amended complaint [#56].

13 9. On October 21, 2019, Plaintiff served his amended complaint on Phillip Watford.
14 Phillip Watford filed his answer to the amended complaint on November 12, 2019 [#64].

15 10. On November 14, 2019, the parties filed a third request for an extension of time as it
16 related to the Discovery Cut-Off, Dispositive Motion deadline, and the proposed Joint Pretrial Order
17 deadline [#66].

18 11. On November 14, 2019, the United States District Court filed its Order [#67], granting
19 the stipulated extension of the Discovery Cut-Off, Dispositive Motion deadline, and the proposed
20 Joint Pretrial Order dates.

21 12. On January 21, 2020, Defendants filed their Motion for Summary Judgment [#68],
22 which was denied in part by the Court on September 25, 2020 [#80].

23 13. On October 15, 2020, Defendants filed their Notice of Appeal to the U.S. Court of
24 Appeals, Ninth Circuit [#81].

25 14. On June 14, 2022, the U.S. Court of Appeals filed its Mandate [#85], affirming this
26 Court's decision.

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15. This is the parties fourth request for an extension of the Joint Pretrial Order. In early 2022, Defendants' attorney was unexpectedly out of state for three months due to a family emergency. Additionally, Defendants' attorney was out of the state for one month after the Mandate was filed and has just recently returned to the office. The parties would like additional time to be prepared to have a productive discussion pursuant to Local Rule 16-3.

16. All parties, as indicated by the signature of counsel below, agree and stipulate to extend the following:

- a. Pretrial Order – August 29, 2022. The parties have scheduled a Pretrial Conference on August 22, 2022.

Dated this 21st day of July, 2022.

CITY OF HENDERSON

/s/Michael J. Oh
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Nevada Bar No. 7470
WADE B. GOCHNOUR
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CITY OF HENDERSON, KARL LIPPISCH,
and PHILLIP WATFORD

Dated this 21st day of July, 2022.

LAW OFFICES OF PETER GOLDSTEIN

/s/ Peter Goldstein
PETER GOLDSTEIN, ESQ.
Nevada Bar No. 6992
10161 Park Run Drive, Suite 150
Las Vegas NV 89145
Attorney for Plaintiff
DANIEL ANDREWS

ORDER

IT IS SO ORDERED.


U.S. MAGISTRATE JUDGE

DATED: July 22, 2022

CITY ATTORNEY'S OFFICE
CITY OF HENDERSON
240 S. WATER STREET MSC 144
HENDERSON, NV 89015

